Case 2.27 cv 01000 CDS MDC Docament II inca 10/15/27 i age 1 c	Case 2:24-cv-01880-CDS-MDC Document 11 F	-iled 10/15/24	Page 1 of 4
--	--	----------------	-------------

1	KNIGHT & RYAN PLLC	
2	Robert A. Ryan, #12084 Scott A. Knight, #9083	
3	8880 W. Sunset Road. Ste. 130 Las Vegas, Nevada 89148	
4	(702) 462-6083	
5	(702) 462-6084 fax robert@knightryan.com	
6	scott@knightryan.com	
7	Attorneys for Defendants MGM Resorts International, and New Castle, LLC	Inc.,
8	W G D	
9	UNITED STATES DIST DISTRICT OF N	
10	SOPHIA PARKER, PSEUDONYMOUSLY,	Case No. 24-cv-01880-CDS-MDC
11	Plaintiff,	STIPULATION AND ORDER
12	v.	TO EXTEND THE DEADLINE FOR DEFENDANTS TO
13	ASTRAL HOTELS LAS VEGAS, INC.,	RESPOND TO THE
14	BALLY'S CORPORATION, MGM RESORTS INTERNATIONAL, THE MIRAGE CASINO-	COMPLAINT
15	HOTEL, LLC, NEW CASTLE, LLC, ONEX CORP., PENN ENTERTAINMENT, INC.,	(FIRST REQUEST)
16	TROPICANA LAS VEGAS, INC., TROPICANA LAS VEGAS HOTEL AND CASINO, INC.,	
17	WYNN LAS VEGAS, LLC, CHANG WEN-TZU, AND LIU KWA-JUA CHEN, AS SUCCESSOR	
18	TRUSTEE FOR THE TE CHAO CHEN & KWA- JUA LIU TRUST,	
19	Defendants.	
20		
21		
22		
23		
24		
25		
26		
27		
28		

1

4 5

6 7

8 9

10

11

12 13

14

15 16

17

18

19 20

21 22

23

25

24

27

26

Las Vegs Hotel and Casino, Inc., Wynn Las Vegas, LLC (collectively the "Parties"), by and through their respective counsel of record, hereby agree and stipulate as follows: 1. On September 3, 2024, Plaintiff filed her Complaint in the Eighth Judicial District Court, Clark County, Nevada (ECF Nos. 1-1) (the "Complaint").

MGM Resorts International, New Castle, LLC, Onex Corp., Penn Entertainment, Inc., Tropicana

Plaintiff, Sophia Parker, Defendants Astral Hotels Las Vegas, Inc., Bally's Corporation,

- 2. Plaintiff served the Complaint on Astral Hotels Las Vegas, Inc. on September 17, 2024 (ECF No. 1-2, p. 2).
- 3. Plaintiff served the Complaint on Defendants, Bally's Corporation, MGM Resorts International, Mirage Casino-Hotel, LLC, New Castle, LLC, Onex Corp., Penn Entertainment, Inc. Tropicana Las Vegas Hotel and Casino, Inc. and Wynn Las Vegas, LLC on September 20, 2024. (ECF No. 1-2, pp. 3-10).
- 4. On October 2, 2024, Plaintiff voluntarily dismissed Defendant, Mirage Casin-Hotel, LLC from the case in the Eighth Judicial District Court. (ECF No. 1-1, p. 26).
- 5. Defendants, Chang Wen-Tzu, and Liu Kwa-Hua Chen as successor trustee for the Te Chao Chen & Kwa Liu Trust have not yet been served.
- 6. On October 8, 2024, Wynn Las Vegas, LLC timely removed the case to this Court pursuant to 28 USC 1331, 14411 and 1446.
- 7. Pursuant to Rule 81(c) of the Federal Rules of Civil Procedure, the deadline to respond to Plaintiff's Complaint is the longest of 21 days after receiving the Complaint, 21 days after being served with the summons for an initial pleading on file at the time of service, or 7 days after notice of removal is filed. As such, the current deadline to respond to the Complaint for Defendants is October 15, 2024.
- 8. The Parties hereby agree, stipulate and respectfully request that the Court extend the deadline for all currently served Defendants to file their response to the Complaint for an additional twenty-one (21) days, making their deadline to respond November 5, 2024.

Case 2:24-cv-01880-CDS-MDC Document 11 Filed 10/15/24 Page 3 of 4

1	9. This extension	n is necessary to pro	rovide counsel for the Defendants sufficient time to		
2	review and respond to the allegations made by Plaintiff in her Complaint. The extension requested				
3	herein will also conserver the Court's resources as it will ensure the Defendants remain on the				
4	same response schedule.				
5	10. This is the first request to extend the response deadline and is not designed for the				
6	purposes of delay.				
7	IT IS SO STIPULAT	CED.			
8 9	Dated: October 14, 2	024			
10	KNIGHT & RYAN		THE 702FIRM INJURY ATTORNEYS		
11	By: /s/ Robert A. Ryan	D., N. 12004	By: /s/Michael C. Kane		
12 13	Robert A. Ryan, Esq., Scott A. Knight, Esq., 8880 W. Sunset Rd, St	Bar No. 9083 uite 130	Michael C. Kane, Esq., Bar No. 10096 Bradley J. Myers, Esq., Bar No. 8857 8335 West Flamingo Road		
14	Las Vegas, Nevada 89 Ph: 702-462-6083 Fx: 702-462-6084	148	Las Vegas, Nevada 89147 Ph: 702-776-3333 Fx: 702-505-9787		
15 16	Attorneys for Defendants M		Jonathan L. Hilton, Esq. (<i>Pro Hac Vice Forthcoming</i>)		
17	International and New Cas	tle, LLC	HILTON PARKER, LLC 7658 Slate Ridge Blvd. Reynoldsburg, OH 43068		
18			Ph: 614-992-2277 Fx: 614-927-5980		
19			Attorney for Plaintiff, Sophia Parker		
20 21					
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$					
$\begin{bmatrix} 22 \\ 23 \end{bmatrix}$					
24					
25					
26					
20 27					
28					
-					

1	SNELL & WILMER	BRANDON SMERBER LAW FIRM
2		
3	By: /s/ Patrick G. Byrne Patrick G. Byrne, Esq., Bar No. 7636	By: <u>/s/ Justin W. Smerber</u> Justin W. Smerber, Esq., Bar No. 10761
4	Dawn L Davis, Esq., Bar No. 13329 1700 South Pavilion Center Drive,	139 E. Warm Springs Rd. Las Vegas, Nevada 89119
5	Suite 700 Las Vegas, NV 89135 Ph: 702-784-5275	Ph: 702-380-0007 Fx: 702-380-2964
6	Fx: 702-784-5252	Attorneys for Defendants Bally's Corporation,
7	JONES DAY Bethany Biesenthal, Esq. (<i>Pro Hac Vice</i>	Onex Corp. Penn Entertainment, Inc., Tropicana Las Vegas, Inc., and Tropicana Las
8	Forthcoming) Allison McQueen, Esq. (Pro Hac Vice	Vegas Hotel and Časino, Inc.
9	Forthcoming) 110 North Wacker Drive, Suite 4800	SYLVESTER & POLEDNAK, LTD.
	Chicago, IL 60606 Ph: 312-782-3939	
11	Fx: 312-782-8585	By: <u>/s/ Allyson R. Johnson</u> Allyson R. Johnson, Esq., Bar No. 8286
12	JONES DAY Nicole Perry, Esq. (<i>Pro Hac Vice</i>	1731 Village Center Circle Las Vegas, Nevada 89134
13	Forthcoming) 717 Texas Street, Suite 3300	Ph: 702-952-5200
14	Houston, TX 77002 Ph: 832-239-3939	Fx: 702-952-5205
15	Fx: 832-239-3600	Attorneys for Defendants Astral Hotels Las
16	Attorneys for Defendant Wynn Las Vegas, LLC	Vegas, Inc.
17		
18		
19		IT IS SO ORDERED.
20		II IS SO ORDERES.
21		
22		Hon. Maximilian D. Couvillier III United States Magistrate Judge
23		Dated: 10/15/2024
24		
25		
26		
27		
28		